

NEM:SHP

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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25 MJ 127

UNITED STATES OF AMERICA

- against -

LORENZO LADSON,

Defendant.

COMPLAINT AND AFFIDAVIT  
IN SUPPORT OF APPLICATION  
FOR AN ARREST WARRANT

(18 U.S.C. § 922(g)(1) and 3551 et seq.)

25-MJ-

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EASTERN DISTRICT OF NEW YORK, SS:

MICHAEL MCCARTHY, being duly sworn, deposes and states that he is a Detective with the New York City Police Department (“NYPD”), and a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”), duly appointed according to the law and acting as such.

On or about April 4, 2025, within the Eastern District of New York and elsewhere, the defendant LORENZO LADSON, knowing that he had been previously convicted in a court of a crime punishable by a term of imprisonment exceeding one year, did knowingly and intentionally possess in and affecting interstate or foreign commerce a firearm, to wit: a Raven Arms .25 caliber semi-automatic pistol with serial number 1635182.

(Title 18, United States Code, Sections 922(g)(1) and 3551 et seq.)

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. I am a Detective with the NYPD and a Task Force Officer with the ATF. I have been a member of the NYPD for approximately 18 years and a Task Force Office for over eight years. I have been involved in the investigation of numerous cases involving the recovery of firearms and ammunition. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation. Where I describe the statements of others, I am doing so only in sum and substance and in part.

2. On or about April 4, 2025, NYPD officers responded to a 911 call reporting an individual armed with a firearm trying to enter an apartment at 165 Rockaway Parkway, Brooklyn, NY 11212. Upon entering the lobby of the building at approximately 1:59 AM, the officers heard shouting and entered a hallway to the immediate left to determine the origin of the disturbance. As the officers entered the hallway, the defendant LORENZO LADSON could be heard saying "take this, take this, take this, take this" to a woman he was standing next to in the threshold of an apartment. As the initial officers shined their flashlight in the direction of LADSON and the woman he was standing next to, a silver object can be seen dropping to the ground on the officers' body-worn camera footage, hitting the ground with a

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

metallic bang. A screenshot from the body-worn camera footage showing LADSON and the woman standing in the threshold of the apartment can be seen below:



3. The officers, observing the defendant LORENZO LADSON wearing a ski mask and latex gloves, directed LADSON to kneel and put his hands in the air. The officers subsequently restrained LADSON. A screenshot from the body-worn camera footage showing LADSON as he approached the officers is below:



4. After LADSON was restrained, the officers approached the door of the apartment from which LADSON had come, and identified the silver object on the ground that had been dropped, which was a firearm. LADSON was then placed under arrest. A screenshot from the body-worn camera footage showing the officer recovering the firearm from the ground is below:



5. NYPD officers subsequently determined that the firearm recovered at the scene was a loaded Raven Arms .25 caliber semi-automatic pistol with serial number 1635182.

6. Following his arrest, the defendant LORENZO LADSON waived his Miranda rights and agreed to give a statement in the interview room of the NYPD's 67th Precinct. LADSON stated that he was helping the individual residing in the apartment clean prior to his arrest, and he had walked out of the apartment after hearing "some screaming" in the hallway. LADSON acknowledged that a firearm was recovered in the hallway but claimed that the firearm was not his. LADSON claimed that he was wearing the ski mask because he was cleaning "with bleach and stuff."

7. I have reviewed the defendant LORENZO LADSON's criminal history and have determined that he has multiple felony convictions. Most recently, on or about July 12, 2018, LADSON was convicted in the United States District Court for the Eastern District of New York, after a guilty plea, of Hobbs Act Robbery and possessing, using, and brandishing a firearm during a crime of violence in violation of 18 U.S.C. §§ 1951(a), 924(c)(1)(A)(ii). On or about December 14, 2022, he was sentenced to one-hundred and two (102) months' custody and five (5) years' supervised release.

8. I have conferred with an interstate nexus expert, a Special Agent of the ATF, who has informed me, in sum and substance, that the Raven Arms .25 caliber semi-automatic pistol with serial number 1635182 recovered in this case was manufactured outside the State of New York.

WHEREFORE, your deponent respectfully requests that the defendant LORENZO LADSON be dealt with according to law.

/s/ Michael McCarthy

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Michael McCarthy  
Detective  
New York City Police Department

Sworn to before me via telephone on this  
8th day of April, 2025

*Joseph A. Marutollo*

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THE HONORABLE JOSEPH A. MARUTOLLO  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK